Claim 7, *inter alia*, requires: "dynamically generating a page of presentation material in response to a request for said first information, wherein the page is generated based on the first presentation layout and includes said first information and does not contain said second information."

For example, as depicted in Fig. 4, the type of material depicted on a display is purpose information. When the user selects an overview item in the table of contents depicted in Fig. 4, the web server passes the request to a dynamic HTTP application, which invokes the web macro to obtain the definition of the overview item. Once the definition of the overview item is obtained, a new page relating to the overview information is generated by the HTTP application. The generated page is passed by the HTTP application to the server, which in turn transmits it to the client. The client then loads it into the web browser, which displays the page such as the page depicted in Fig. 6, page 20 of the specification. That is, the user can no longer view the purpose information by scrolling up and down the screen or pressing page down button, for example. In other words, a new page is generated, which now only contains the overview information. In short, a new page is dynamically generated in response to a user request. It will be appreciated that the foregoing remarks relate to the invention in a general sense, the remarks are not necessarily limitative of any claims and are intended only to help the Examiner better understand the distinguishing aspects of the claims mentioned above.

Schumacher, on the other hand, discloses converting and marking up a document so as to have a document with a predetermined structure (col. 5, line 60 to col. 6, line 16). Accordingly, when the user selects a document that has the predetermined structure, the entire document along with the selectors are displayed in the web browser (col. 9, lines 47 to 48 "the browser also

displays text in the chosen document as shown at 170). That is, as depicted in Fig. 5 (scroll bar 96) of Schumacher, the text of the document is displayed in the web browser. In other words, by scrolling down, the user may read various sections of the document.

Schumacher further discloses that the document may be long and the user often wishes to access information found in a particular section of the document (col. 2, lines 30 to 34 and col. 10, line 63 to col. 11, line 11), accordingly, selectors 56 and 58 are provided to jump to a particular section within the displayed document text (col. 2, lines 39 to 45 and col. 9, lines 49 to 56).

In Schumacher, however, the entire document having a predefined structure is displayed. In Schumacher, the selectors 56 and 58, as well as page up and down buttons, are only used to navigate through the displayed web page. That is, the displayed documents are often larger then the average display and as such the user is forced to scroll up and down to access the desired information. In Schumacher, buttons are provided to allow access to a pre-defined section of a displayed document (col. 10, lines 65-67). In short, Schumacher discloses a static, pre-defined document, of which navigation is facilitated with various buttons (col. 4, lines 36-37; col. 6, lines 14-16; and Figs. 2(A)-2(C)).

Schumacher fails to disclose or suggest dynamically generating a page of presentation material in response to a user request. That is, in Schumacher, once a request for a predetermined section is received, the web browser navigates through the displayed document to provide view access to this predetermined section. In other words, in Schumacher, the browser does not need to dynamically generate a page of presentation in response to the user request but only needs to find the predetermined section in a text of this static document. In short,

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Schumacher fails to disclose or suggest "dynamically generating a page of presentation material in response to a request for said first information, wherein the page is generated based on the first presentation layout and includes said first information and does not contain said second information."

In response to Applicant's arguments, the Examiner alleges:

> [t]he fact that the page is generated to be displayed in response to a request via button selecting where *the displayed page is changed according to different buttons* shows that generating any page of presentation material is *carried out dynamically in response to a different request* (*see* page 5 of the Office Action).

Applicant respectfully submits, however, that, in Schumacher, the alleged "displayed page" is the text of the document itself. In other words, Schumacher discloses that:

> The bmp file allows the browser to display the icons as shown at 170 for selectors 56, 58 (in Fig. 5). The browser also displays the text in the chosen document as shown at 170 (col. 9, lines 47 to 48).

The selectors are then used to jump to a particular portion of this document. In Schumacher, however, there is no disclosure of any dynamic generation of a page of presentation material. In short, Schumacher fails to explicitly or implicitly disclose dynamic generation of a page when a user depresses one of the selectors.

If, on the other hand, the Examiner alleges that any change on the display discloses dynamic generation of a new page, Applicant respectfully requests the Examiner to cite an appropriate reference to this regard. That is, it is Applicant's position that scrolling in a displayed document does not involve a dynamic generation of a new page. Therefore,

Schumacher does not disclose any dynamic generation of a page of presentation material.

Likewise, Egilsson fails to cure the above-identified deficiencies of Schumacher.

Furthermore, the Examiner acknowledges that Schumacher fails to disclose or suggest

"defining, in a first portion of the file, a first variable equal to first information and a second

variable equal to second information; defining, in a second portion of the file, first and second

presentation layouts, wherein said first presentation layout includes said first variable and said

second presentation layout includes said second variable," as set forth in claim 7. The Examiner,

however, alleges that Egilsson cures the deficient teachings of Schumacher (*see* page 3 of the

Office Action). Applicant respectfully disagrees.

Specifically, the Examiner alleges that col. 7, lines 25 to 36 of Egilsson disclose these

unique features of claim 7. Col. 7, lines 25 to 36 of Egilsson recite:

```
The above application building and sharing
environment may further include means for
associating and displaying with the module
icon, of a program module from above
collection, icons representing user selected
variables within the program module
specification. This feature may be provided
by associating a control icon, usually a
button, with a specific variable in the
program specification. Then means for
allowing a user to access the full value of
the variable, associated to the control icon,
may be provided by executing, upon request,
the program parts needed to define the
variable and when the variable value has been
determined the fall value is displayed.
```

As is visible from the above-quoted passage, Egilsson only discloses associating icons with user

selected variables and displaying the full value of a variable upon a user request. Egilsson,

however, fails to disclose or suggest having a file with one portion having variables linked to

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information and in another portion having the variable linked with a presentation layout. In

short, Egilsson fails to cure the deficient teachings of Schumacher.

Moreover, one of ordinary skill in the art would not have been motivated to combine the

references in the manner suggested by the Examiner. The Examiner alleges that one of ordinary

skill in the art would have been motivated to incorporate Egilsson into Schumacher "for having

each portion of data corresponding to each button or icon, and corresponding to each variable

associated with each button or icon" (*see* page 4 of the Office Action). This reason for

motivation to combine is not understood. That is, Schumacher discloses having a mapping file

and a bmp file that store correspondence between the selectors and the data structure (Fig. 8; col.

9, line 49 to 55). In other words, Schumacher already provides a way to have a portion of data

correspond to a variable associated with a button or an icon. As such, the relevance of Egilsson

is not understood.

In addition, assuming *arguendo* that Egilsson discloses a single file with the above-

discussed portions, then combining Egilsson with Schumacher will change the principle

operation of the Schumacher, which discloses that every book should have a map file and a bmp

file (col. 10, lines 43 to 51).

In short, taken alone or in any conceivable combination, the combined teachings of

Schumacher and Egilsson fail to teach or suggest dynamically generating a page of presentation

material and having a file with one portion storing variable values and in other having

presentation layouts be linked to variables, as set forth in some variation in claim 7. Together

the combined teachings of these references would not have and could not have led an artisan of

ordinary skill in the art to achieve the subject matter of claim 7. Therefore, Applicant

respectfully requests the Examiner to withdraw this rejection of claim 7. Claims 8-10 are

patentable at least by virtue of their dependency on claim 7.

In addition, dependent claim 9 recites that "said web browser does not support a

hypertext markup language (HTML) frame tag." The Examiner alleges that Schumacher

discloses a web browser that does not support frames in Figs. 10 and 12-13 (*see* page 4 of the

Office Action). While Figs. 10 and 12-13 of Schumacher appears to display a web page without

frames, this does not mean that the web browser does not support an HTML frame tag. Indeed, a

web browser that supports an HTML frame tag <u>can display both a web page using frames and a</u>

<u>web page not using frames</u>. In other words, Schumacher does not disclose or suggest a web

browser that does not support HTML frame tags. Egilsson does not cure the deficient teachings

of Schumacher. For at least this additional reason, claim 9 is patentable over the combined

teachings of Schumacher and Egilsson.

Independent claims 11 and 27 recite features similar to, although not necessarily

coextensive with, the features argued above with respect to claim 7. Therefore, arguments

presented with respect to claim 7 are respectfully submitted to apply with equal force here. For

at least substantially analogous reasons, therefore, independent claims 11 and 27 are patentable

over Schumacher in view of Egilsson. Claims 12 and 28-31 are patentable at least by virtue of

their dependency on claims 11 and 27, respectively.

In addition, claim 29 recites: "wherein a background is stored in the definition area and is

combined with the selected presentation definition section for uniform display across the

presentation areas displayed on a web browser." The Office Action alleges that claim 29 is

rejected under the same rationale as claims 7-10 (*see* page 4 of the Office Action). However,

claims 7-10 do not disclose "a background." Accordingly, the Office Action fails to address the

unique features of claim 29.

Moreover, it is Applicant's position that the combined teachings of Schumacher and

Egilsson, taken alone or in any conceivable combination, fail to disclose or suggest having a

background stored in definition area and combining it with the selected presentation definition

section. For at least these additional reasons, claim 29 is patentable over the combined teachings

of Schumacher and Egilsson.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly invited to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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